

Judicial Assignment: Hon. Robert S. Lasnik

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

MAPLE LEAF HOUSING
INVESTMENTS, LLC, a Washington
company,

Plaintiff,

vs.

TEXACO DOWNSTREAM PROPERTIES
Inc., a Delaware corporation,

Defendant.

Case No. 2:18-cv-01710-RSL

**STIPULATED MOTION AND
ORDER EXTENDING TIME FOR
RESPONSIVE PLEADING**

Pursuant to the order entered by this Court on the stipulation between Plaintiff MAPLE LEAF HOUSING, INVESTMENTS, LLC's ("Plaintiff") and Defendant TEXACO DOWNSTREAM PROPERTIES INC. ("Defendant"), Defendant's responsive pleading is due January 18, 2019. *See*, Dkt. # 15. Plaintiff and Defendant now jointly move under FRCP 6(b) for a 21-day extension of Defendant's deadline to file a responsive pleading to February 8, 2019. There is good cause for granting an extension because it will afford the parties an opportunity to resolve several claims in this action without the need for motion practice.

The Parties have been making substantial progress in reaching a negotiated agreement to resolve issues raised by the Defendant's November 30, 2018, meet and

1 confer correspondence (“Meet and Confer Correspondence”), in which Defendant
2 requested Plaintiff dismiss or restate certain claims for relief. If successful, the parties
3 would reduce, if not eliminate entirely, the need for a motion to dismiss certain claims,
4 which would result in judicial economy. If the parties succeed in reaching an agreement
5 to resolve the issues raised in the Meet and Confer Correspondence, the parties anticipate
6 requesting a stay of limited duration of all litigation deadlines while additional data
7 regarding the hazardous substances on the Plaintiff’s property are collected.

8 Pursuant to FRCP Rule 6(b), the Court may, for good cause, extend the
9 time for Defendant to respond to Plaintiff’s Complaint.

10 Based on the foregoing, Plaintiff and Defendant jointly request that the
11 Court issue an order extending the deadlines for Defendant’s responsive pleading twenty-
12 one days to February 8, 2019.

13 IT IS SO STIPULATED THROUGH COUNSEL OF RECORD

14
15 Dated: January 18, 2019

ROGERS JOSEPH O'DONNELL, PC

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17 By: /s/ Robert C. Goodman

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27 INC.

1 Dated: January 17, 2019

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14 I attest that concurrence in the filing of this document has been obtained
15 from David F. Stearns, counsel for Maple Leaf Housing Investments, LLC.
16

17 Dated: January 17, 2019

ROGERS JOSEPH O'DONNELL

18 By: /s/ Robert C. Goodman
19 ROBERT C. GOODMAN
20 Attorneys for Defendant
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Defendant's responsive pleading shall be filed no later than February 8, 2019.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: January 22, 2019.

Robert S. Lasnik
United States District Judge